

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON, )  
LINDSAY ELIZABETH, and HEATHER )  
HENDER, individually and on )  
behalf of others similarly )  
situated, )

Plaintiffs, )

v. ) 3:18-cv-01477-JR

NIKE, INC., an Oregon )  
corporation, )  
Defendant. )

DEPOSITION OF PAIGE AZAVEDO

January 29, 2021

Friday

10:02 A.M.

THE VIDEOCONFERENCE VIDEO-RECORDED  
DEPOSITION OF PAIGE AZAVEDO was taken at Portland,  
Oregon, before Jan R. Duiven, CSR, FCRR, RPR, CRC,  
Certified Shorthand Reporter in and for the State  
of Oregon.

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1                   We -- we had -- we were a new team                   16:04:56  
2                   within the organization. As I mentioned, we were                   16:04:59  
3                   brought over -- our wholesale picked up and moved                   16:05:01  
4                   into digital brand from the retail brand team and                   16:05:04  
5                   so the team wasn't really clear about what we did                   16:05:08  
6                   and who we were.                   16:05:12

7                   And -- and so [REDACTED], instead of                   16:05:15  
8                   bringing us together, he basically -- he basically                   16:05:20  
9                   kind of segmented us off to the -- off to the side                   16:05:27  
10                  and didn't -- he would consistently put me down in                   16:05:30  
11                  front of people. He would -- he would -- he would                   16:05:36  
12                  tell me and -- and others on the team that I was                   16:05:41  
13                  doing a terrible job. That I was a bad -- you                   16:05:46  
14                  know, bad leader.                   16:05:49

15                  That he -- you know, when there were                   16:05:50  
16                  opportunities for kind of larger programs or                   16:05:54  
17                  larger opportunities within the org, he gave it to                   16:06:00  
18                  his -- his boys which, you know, is like [REDACTED]                   16:06:04  
19                  [REDACTED].                   16:06:07

20                  There was a -- I think one other -- I                   16:06:14  
21                  can't remember his name off the top of my head,                   16:06:16  
22                  those guys were the ones who were -- who were kind                   16:06:18  
23                  of given the larger opportunities to do the more                   16:06:21  
24                  visible-to-leadership programming.                   16:06:32

25                  And he was just -- he was so                   16:06:33

1 demeaning, you know, in my -- in my -- the minute 16:06:34  
2 when I finally just ended up where I'd had enough 16:06:41  
3 is when, you know, he -- in a meeting with just 16:06:46  
4 the two of us, he's -- you know, apologize for my 16:06:49  
5 language, but, you know, he said, "I don't even 16:06:53  
6 know what the fuck you do all day. I don't know 16:06:55  
7 what your team does all day, but you better get on 16:06:57  
8 board or you're done. You're out." 16:07:01

9 And he would -- he would threaten me 16:07:02  
10 all the time with either get on board, get your 16:07:04  
11 shit together, or you're going to be fired. 16:07:09

12 And that was done over the phone. It 16:07:14  
13 was done in one-on-ones. And he would threaten 16:07:17  
14 people on my team as well. So Chelsea and Kerry, 16:07:22  
15 in particular, were -- were folks that he had 16:07:26  
16 targeted as issues on the team. 16:07:30

17 He had no examples of any of the 16:07:34  
18 things that were problems for any of us, myself, 16:07:39  
19 Chelsea, Kerry. He would never give specific 16:07:43  
20 examples or provide any specific documentation of 16:07:46  
21 any issues. He would just say, "You guys -- you 16:07:49  
22 guys need to get your shit together or you're 16:07:52  
23 gone." 16:07:54

24 So that -- those are -- this was -- 16:07:55  
25 this was kind of a -- not kind of. It was a 16:08:00

1 weekly -- and often more than once during the 16:08:02  
2 week -- phenomenon in which he would -- he would 16:08:07  
3 threaten that over the course of my time reporting 16:08:11  
4 to him. 16:08:14

5 Q. Okay. Any other ways that you believe 16:08:17  
6 ██████████ discriminated against you or members of 16:08:19  
7 your team based on your gender? 16:08:23

8 A. I mean, I guess, no. I think that 16:08:24  
9 there was -- there was other instances within the 16:08:38  
10 organization with ██████████ but those are -- those 16:08:41  
11 are them. 16:08:44

12 Q. When you say, "Other instances within 16:08:46  
13 the organization," are you referring to what you 16:08:54  
14 told me about earlier with ██████████ and the gentleman's 16:08:57  
15 name who I'm forgetting right now? 16:09:04

16 A. ██████████ ██████████ ██████████ 16:09:05

17 Q. Yeah. Is that what you're referring 16:09:07  
18 to there? 16:09:08

19 A. No. I'm talking about within North 16:09:08  
20 America now. So there was a -- there was a -- 16:09:11  
21 there was another situation -- ██████████, who 16:09:16  
22 actually I had hired into Nike back in my days in 16:09:20  
23 DT- -- direct-to-consumer, he had -- he had made 16:09:25  
24 his way over to North America digital brand and -- 16:09:28  
25 and so we were -- fundamentally, we were working 16:09:35

on the same team ultimately again. 16:09:38

I was -- I was the -- the head of -- 16:09:40

or the director of North America digital and he -- 16:09:45

I think he was doing like a -- a sportswear role. 16:09:51

I can't remember exactly what he was doing but we 16:09:54

ended up kind of in the same team again after -- 16:09:56

after a couple years being in separate teams. 16:09:58

And [REDACTED] decided -- I think he got an 16:10:01

offer from an external company and so he was 16:10:05

getting ready to leave Nike, and [REDACTED] 16:10:11

took [REDACTED] out for beers and basically offered him 16:10:16

whatever role he wanted in order to stay. I don't 16:10:25

know what compensation changes were made as well 16:10:30

there, but he was offered for him to basically 16:10:34

make -- he made up a role for him. 16:10:37

Again, kind of this ended up being 16:10:41

a -- I think it was like he did vending machines 16:10:43

for Nike devices. I don't even know. It was a 16:10:46

very strange role nobody quite understood. 16:10:51

But at the time, you know, it's 16:10:54

like -- it's silly things where, you know, in 16:10:56

order to keep [REDACTED] there, they -- they moved me 16:10:59

out of my office space in order to free it up for 16:11:03

[REDACTED] even though I had teammate -- you know, 16:11:06

people reporting in to me, needed an office space 16:11:10

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1 for -- for confidential one-on-ones with them, it 16:11:13  
2 was more important to -- to keep [REDACTED] on the team 16:11:16  
3 and to give him what he needed and what he wanted 16:11:20  
4 instead of doing what's right for -- for me and my 16:11:23  
5 team. 16:11:26

6 So that was just another example of -- 16:11:27  
7 of just blatant preferential treatment within the 16:11:30  
8 organization when -- you know, for someone that -- 16:11:34  
9 that [REDACTED] and -- and his team perceived as -- 16:11:40  
10 as one of the boys. 16:11:45

11 Q. Was Mr. [REDACTED]'s team separate than 16:11:55  
12 [REDACTED]'s team? 16:11:58

13 A. [REDACTED] reported to [REDACTED]. 16:11:58

14 Q. How many people reported to [REDACTED] like 16:12:00  
15 at the same time you did? 16:12:02

16 A. Hmm. Probably around six or seven 16:12:04  
17 maybe. Somewhere in there. He had an admin and 16:12:06  
18 probably six or seven of us or probably five or 16:12:11  
19 six of us reporting to him. 16:12:14

20 Q. Okay. Who else reported to Mr. -- or 16:12:15  
21 to [REDACTED] at the same time that you did? 16:12:18

22 A. Oh, boy. I know Paul [REDACTED] 16:12:19  
23 [REDACTED]. There was a woman -- I can't remember 16:12:26  
24 her name off the top of my head. Their admin. He 16:12:33  
25 had an admin that reported to him. He had a 16:12:37

1 Mr. -- or [REDACTED] direct reports you told me 17:01:30  
2 about? Were you the only one that was not given 17:01:35  
3 larger opportunity? 17:01:38  
4 A. I don't recall the experience that 17:01:40  
5 others had. So I can only -- I can only speak 17:01:47  
6 for -- for -- for myself and my team in this. I 17:01:54  
7 don't recall. 17:02:01  
8 Q. Okay. All right. Well, I guess just 17:02:01  
9 maybe like -- just, you know, based on your 17:02:03  
10 personal experience, was there anyone else on 17:02:05  
11 [REDACTED] team of his direct reports that you 17:02:09  
12 observed as being excluded from larger 17:02:11  
13 opportunities that he gave to, for example, [REDACTED] 17:02:15  
14 and [REDACTED]? 17:02:22  
15 A. No. 17:02:22  
16 Q. All right. Okay. If I can ask you to 17:02:23  
17 look at Exhibit 180 again. 17:03:19  
18 A. Okay. 17:03:32  
19 Q. Okay. And, actually, maybe before -- 17:03:32  
20 well, it's kind of later, but you referred to -- a 17:03:35  
21 couple times to the old boys' club? 17:03:38  
22 A. Uh-huh. Yes. 17:03:42  
23 Q. What do you mean by that? 17:03:42  
24 A. I just -- just how I described. There 17:03:43  
25 was a -- a group of guys in [REDACTED] role in 17:03:54

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1 particular on his team in particular who -- who 17:03:58  
2 were -- you know, they went out together. They 17:04:02  
3 partied together. They went to each other's 17:04:07  
4 weddings. They went to each other's events. They 17:04:10  
5 were then given additional opportunities. 17:04:17

6 Even in meetings, they were -- they 17:04:19  
7 were treated differently. You know, their voice 17:04:27  
8 was -- was definitely heard more than -- than mine 17:04:30  
9 or people on my team in the room. And, you know, 17:04:37  
10 that extended to [REDACTED] being kind of part of 17:04:40  
11 the -- [REDACTED] friend as well, [REDACTED] and he -- 17:04:46  
12 you know, he was sort of protected. 17:04:51

13 And -- and so, yeah, the old boys' 17:04:54  
14 team network, from my perspective, was that group 17:05:01  
15 of guys who just -- they all hung together and 17:05:03  
16 [REDACTED] gave them a different level of 17:05:06  
17 respect. He gave them projects that were more 17:05:11  
18 visible. Gave them opportunities that didn't 17:05:13  
19 exist for me. 17:05:16

20 Q. Okay. Okay. And -- okay. So the 17:05:20  
21 group of guys on [REDACTED] team, [REDACTED] 17:05:32  
22 Are you also including the person who worked in 17:05:39  
23 basketball whose name you can't recall? 17:05:43

24 A. Yeah. There's -- I mean, there's -- 17:05:45  
25 there's a few of them. I -- oh, [REDACTED] was 17:05:47

1 party, that instance that you told me about? He 17:16:17  
2 had -- [REDACTED] had a dinner for the whole team and 17:16:23  
3 you said the guys got in an Uber and went to 17:16:28  
4 downtown Portland. Of the people on that team 17:16:33  
5 that you were describing, was there anyone else 17:16:36  
6 like besides you that didn't go? 17:16:41

7 A. I know the members of my team did not 17:16:44  
8 go. So Chelsea, Tracy, Danielle, my -- I -- I 17:16:46  
9 recall that none of them went as well. 17:16:52

10 Q. Okay. And do you know if any female 17:16:56  
11 members of his team went to downtown Portland 17:17:11  
12 after that holiday party? 17:17:16

13 A. I don't believe so. I believe it was 17:17:18  
14 just the boys. 17:17:22

15 Q. Any male members of his team that 17:17:27  
16 didn't go? 17:17:30

17 A. I -- I'm sure there was. Again, 17:17:33  
18 same -- same answer. I believe there was probably 17:17:35  
19 guys that did not go. Yeah. 17:17:38

20 Q. Okay. Okay. And you mentioned 17:17:41  
21 earlier that you said [REDACTED] was sort of protected. 17:17:54  
22 Do you remember that testimony? 17:18:00

23 A. Yes. 17:18:01

24 Q. What do you mean by that? Or how -- 17:18:02  
25 I'll ask it this way. How is he protected? 17:18:05

1           A.     There was a general understanding           17:18:07  
2     that -- and mostly because he would talk about it       17:18:11  
3     a lot -- that he was a friend of [REDACTED]s. That       17:18:14  
4     he was -- [REDACTED] was his sponsor and accelerate to   17:18:18  
5     get him to the VP level. And -- and so from that       17:18:22  
6     perspective with -- with [REDACTED] in his corner,       17:18:28  
7     [REDACTED] was protected.                               17:18:31

8                     And -- and, you know, he would tell us   17:18:32  
9     that -- I told you in the very first meeting, he       17:18:35  
10    made it very clear that he -- that [REDACTED] was his   17:18:39  
11    mentor and advocate in the accelerate program.       17:18:42  
12    He -- he was also, you know, brought over by       17:18:48  
13    [REDACTED], who, you know, also made -- you know,   17:18:52  
14    was -- was -- had preferential, I guess, treatment   17:18:57  
15    of [REDACTED]. He kind of let things go that --       17:19:04  
16    that -- within the organization that I don't       17:19:07  
17    think -- that he probably shouldn't have.           17:19:14

18                     And -- and so, you know, but he just   17:19:15  
19    was untouchable because he was pretty clear about       17:19:17  
20    his relationship with [REDACTED]. That was the       17:19:20  
21    biggest part of it.                                       17:19:23

22           Q.     And when you said he kind of let           17:19:25  
23    things go with respect to [REDACTED], I think you were   17:19:33  
24    referring to [REDACTED] there?                           17:19:36

25           A.     Yes.   17:19:38

1 response to you was -- strike that. 17:33:27

2 Any reason to believe that [REDACTED] 17:33:35

3 response to you wasn't genuine? 17:33:40

4 MR. BLAKE: Objection. Calls for 17:33:43

5 speculation. 17:33:46

6 A. Yeah. I have no idea. 17:33:46

7 BY MS. ZABELE: 17:33:51

8 Q. Okay. So other than that, any other 17:33:51

9 instance in which you expressed interest in a 17:33:53

10 promotion at Nike? 17:33:56

11 A. No. 17:34:01

12 Q. And did you apply for any other 17:34:09

13 promotions at Nike -- well, strike that. Let me 17:34:14

14 try again. 17:34:18

15 Any other roles that you sought at 17:34:18

16 Nike that you didn't get that we haven't talked 17:34:33

17 about? 17:34:35

18 A. No. 17:34:36

19 Q. Okay. So let's -- okay. Back on 17:34:38

20 Exhibit 180. Okay. Paragraph six. It's the one, 17:34:49

21 two -- the fourth sentence. Do you see it says, 17:34:58

22 "I complained to human resources about [REDACTED] 17:35:03

23 but they did not take any remedial action while I 17:35:05

24 was there"? 17:35:08

25 Do you see that? 17:35:09

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1	<u>A.</u>	<u>Yes.</u>	<u>17:35:10</u>
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<u>2</u>	<u>Q.</u>	<u>Okay. When did you complain to human</u>	<u>17:35:12</u>
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3 resources about [REDACTED] 17:35:14

4 | A. It would have been right at the end, 17:35:16

5 | in that January-February time period. 17:35:19

<u>6</u>	<u>Q.</u>	<u>The end of your employment at Nike?</u>	<u>17:35:21</u>
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7 | A. Yeah. Sorry. And also around the New 17:35:25

8 | York event I talked to you about, and I couldn't 17:35:28

9 | tell you when that was. It would have been at the 17:35:30

10	end of -- probably close to the end of the year of	17:35:32
----	--	----------

11	2014. I don't recall exactly when that sales	17:35:37
----	--	----------

12 meeting was, but that was the other time when I 17:35:40

13	had conversations with HR about my frustration	17:35:43
----	--	----------

14 that I was being -- I was being threatened with my 17:35:47

15 job, and so was Kerry, and we had zero 17:35:52

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16 | documentation to back that up, and was getting 17:35:55
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17     nothing.    So I -- I'd had that conversation with     17:35:59

18	Dominic as well.	17:36:02
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19 Q. Okay. Yeah. That was my question. 17:36:03

20 So maybe just focusing on the first conversation 17:36:05

21	regarding the New York meeting at or about the end	17:36:09
----	--	----------

22 of 2014 that you mentioned. So your conversations 17:36:12

23	with HR were with Dominic Mara?	17:36:16
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24	A. Yes.	17:36:21
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25	Q.	How many conversations did you have	17:36:21
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1 with Mr. Mara about that New York meeting? 17:36:25

2 A. We had one or two, and then we had a 17:36:30

3 couple of -- my -- my recollection is that there 17:36:34

4 was a couple of email exchanges as well where I 17:36:36

5 followed up. I believe I had at least one 17:36:38

6 conversation with Dominic and then a couple of 17:36:41

7 email follow-ups that I had sent off to him asking 17:36:47

8 him to -- to actually give me what they promised, 17:36:51

9 which was documented examples and proof of 17:36:56

10 performance issues. 17:37:01

11 Q. Okay. Did you ever complain to anyone 17:37:17

12 else at Nike besides Dominic Mara about the -- 17:37:22

13 sorry. I just want to -- 17:37:36

14 A. Ask the question.

15 Q. Yeah, yeah, yeah. Sorry. I just want 17:37:42

16 to make sure I'm accurately questioning you back 17:37:43

17 about your testimony. Just give me a sec. 17:37:50

18 Okay. All right. Well, did you ever 17:38:10

19 complain to anyone else at Nike besides Dominic 17:38:11

20 Mara about this New York meeting and what you've 17:38:15

21 called a lack of documentation at any time? 17:38:19

22 A. Not -- no. Not to HR. No. 17:38:28

23 Q. What about anyone outside HR? 17:38:31

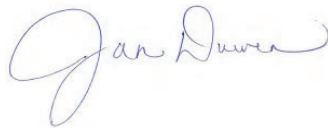
24 A. I'm trying to think if I had a 17:38:33

25 conversation with Cindy King. I believe that I 17:38:43

## CERTIFICATE

I, Jan R. Duiven, CSR, FCRR, CRC, RPR, a Certified Shorthand Reporter for the State of Oregon, do hereby certify that, pursuant to stipulation of counsel for the respective parties hereinbefore set forth, PAIGE AZAVEDO appeared virtually before me at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction; and that the foregoing transcript, pages 1 to 245, both inclusive, constitutes a full, true, and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof.

Witness my hand at Eugene, Oregon, this 12th day of February, 2021.



Jan R. Duiven, CSR, FCRR, CRC, RPR

CSR No. 96-0327

Expiration Date: September 30, 2023

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